

EXHIBIT A

No. 22-1963

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

CARYN DEVINS STRICKLAND,

Plaintiff-Appellant,

v.

UNITED STATES, ET AL.,

Defendants-Appellees.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA

**MOTION FOR PERMISSION TO EXTEND THE
WORD LIMIT ON APPELLANT'S
PRINCIPAL BRIEF**

Pursuant to Fourth Circuit Rules 27 and 32(b), Appellant Caryn Devins Strickland respectfully requests this Court's advance permission to file a principal brief not to exceed 16,500 words. This Motion is filed in advance of the deadline required by Fourth Circuit Rule 32.

This Court granted Strickland permission to file a brief of 16,500 words in the prior appeal in this case. *Strickland v. United States*, Doc. 36, No. 21-1346 (4th Cir. 2021). That appeal of the district court's order dismissing her constitutional claims involved profound issues of first impression and numerous factual issues and legal claims. Strickland's complaint, alleging sexual harassment, discrimination, and retaliation during her employment as a federal public defender, as well as

fundamentally unfair procedures for addressing her workplace discrimination claims, was 85 pages long. This Court's opinion, holding that her equal protection and due process claims could proceed against the official capacity defendants, was 118 pages long. *Strickland v. United States*, 32 F.4th 311 (4th Cir. 2022).

This appeal similarly involves profound questions and numerous legal issues. To explain why the district court erred in denying Strickland's motion for a preliminary injunction, an extensive analysis of the merits of her claims is needed. But instead of relying only on the complaint's allegations, as in the prior appeal, Strickland's brief in this appeal will draw on hundreds of pages of evidence in the summary judgment record. Moreover, the procedural history of this case is far more complicated in than the prior appeal. This litigation has lasted more than two-and-a-half years, with more than 150 filings in the district court. In addition to the preliminary injunction denial, this appeal raises other potentially case-dispositive issues, including whether Strickland is entitled to judgment in her favor on the merits. These issues are appropriately raised by the record for this Court's review. Additional words are needed to adequately discuss these important issues.

In sum, every effort has been made to present the important issues raised in this appeal as succinctly as possible. But the number of issues involved unavoidably requires a modest word-limit extension to facilitate the Court's review. If granted a modest extension of 3,500 extra words, Strickland would consent to a similar word

limit extension for Appellees. Appellees' counsel stated that they do not oppose Appellant's request.

Respectfully Submitted,

/s/ Jeannie Suk Gersen

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* Pending forthcoming application for admission in the Fourth Circuit.

CERTIFICATE OF COMPLIANCE

I certify that this Motion complies with the type-volume limitations of Fed. R. App. P. 27(d)(2) because it contains 379 words, excluding the parts exempted by Fed. R. App. P. 27(d)(2). This Motion complies with the typeface and type-style requirements of Fed. R. App. P. 27(d)(1) because it has been prepared in a 14-point, proportionally spaced typeface.

/s/ Cooper Strickland
Cooper Strickland

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of October, 2022, I electronically filed the foregoing Motion with the Clerk of the Court for the United States Court of Appeals for the Fourth Circuit by using the Court's appellate CM/ECF system, which accomplished service on counsel of record through CM/ECF.

/s/ Cooper Strickland
Cooper Strickland